



GEORGIA M. PESTANA
Acting Corporation Counsel

**THE CITY OF NEW YORK
LAW DEPARTMENT**

100 CHURCH STREET
NEW YORK, NY 10007

LAURA C. WILLIAMS
Assistant Corporation Counsel
Labor & Employment Law Division
Phone: 212-356-2435
lawillia@law.nyc.gov

June 14, 2021

BY ECF

Honorable Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street, Room 12A
New York, NY 10007

Re: Figueroa v. The City of New York, et al.
20 Civ. 10050 (LAP)

Dear Judge Preska:

I am an Assistant Corporation Counsel in the office of Georgia M. Pestana, Acting Corporation Counsel of the City of New York, assigned to represent defendants City of New York and New York City Police Department (“City Defendants”)¹ in the above-referenced matter. I write to respectfully request a one-week extension of time, from June 16, 2021 to June 23, 2021, for City Defendants to serve and file their reply to Plaintiff’s opposition to City Defendants’ motion to dismiss. City Defendants previously requested, and the Court granted, an extension of time from June 2, 2021 to June 16, 2021 for City Defendants to serve and file their reply. Plaintiff’s counsel consents to this request.

This extension is necessary because, as has been widely reported, our office has had a complete loss of technological access and resources over the last week. In particular, access to the New York City Law Department’s network and emails was completely disabled and access is currently being restored on a rolling and limited basis. Accordingly, for nearly a week I was unable to work on the reply as I did not have access to my work product, relevant documents, or emails. Therefore, City Defendants respectfully request a one-week extension of time to serve and file their reply.

¹ Upon information and belief, the individually named defendant, Peter Mormile, has not been served with a summons and complaint.

Thank you for your consideration of this request.

Respectfully submitted,

/s/

Laura C. Williams
Assistant Corporation Counsel

cc: Zachary T. Tortora, Esq. (By ECF)
Derek Smith Law Group, PLLC
Attorneys for Plaintiff

SO ORDERED.

Louella A. Presley 6/15/2021